REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-21 in the application. The Applicants have not amended, canceled or added any claims. Accordingly, Claims 1-21 are currently pending in the application.

I.   Rejection of Claims 1, 4-6, 8, 11-13, 15 and 18-20 under 35 U.S.C. §102

The Examiner has rejected Claims 1, 4-6, 8, 11-13, 15 and 18-20 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,424,971 to Kreulen, *et al.* The Applicants respectfully disagree.

Kreulen does not teach controlling access to a resource of a computer system as recited in independent Claims 1, 8 and 15. Instead, Kreulen is directed to interactively classifying and analyzing data and is particularly applicable to classification and analysis of textual data. (*See* column 1, lines 6-8.) Thus, Kreulen teaches classifying and analyzing data on a computer but does not teach controlling access to a resource of the computer.

Additionally, Kreulen does not teach a database of problems and corresponding precalculated solutions as recited in independent Claims 1, 8 and 15. Instead, Kreulen teaches a database system that selects one or more classes of documents in response to an inquiry. The selected class or classes are then provided as a solution to the inquiry. (*See* column 3, line 46 to column 4, line 4 and Figure 2.) Thus, the database system of Kreulen does not include problems and corresponding precalculated solutions but provides a solution to an inquiry presented to the database system.

Kreulen, therefore, for at least the reasons above, does not teach or suggest each element of independent Claims 1, 8 and 15 and Claims dependent thereon. As such, Kreulen does not anticipate

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Claims 1, 4-6, 8, 11-13, 15 and 18-20. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102(e) rejection and allow issuance of Claims 1, 4-6, 8, 11-13, 15 and 18-20.

II.   Rejection of Claims 2-3, 7, 9-10, 14, 16-17 and 21 under 35 U.S.C. §103

The Examiner has rejected Claims 2-3, 7, 9-10, 14, 16-17 and 21 under 35 U.S.C. §103(a) as being unpatentable over Kreulen in view of U.S. Patent No. 6,236,972 to Shkedy. The Applicants respectfully disagree.

As discussed above, Kreulen does not teach each element of independent Claims 1, 8 and 15. Additionally, Kreulen does not suggest each element of independent Claims 1, 8 and 15 since Kreulen teaches a database that does not include problems and corresponding precalculated solutions. (*See* column 3, line 46 to column 4, line 4 and Figure 2.) Shkedy has not been cited to cure the deficiencies of Kreulen but to teach the subject matter of certain dependent claims. (*See* Examiner's Action, pages 6-7.)

Additionally, Shkedy does not teach or suggest controlling access to a resource of a computer system that includes employing a database of problems and corresponding precalculated solutions. In fact, the Applicants do not find any teaching or suggestion in Shkedy of controlling access to resources of a computer system. On the contrary, Shkedy is directed to a method and an apparatus for facilitating transactions on a commercial network system and is specifically directed to a method and system for facilitating secondary trading of shares of an investment company such as an open-ended mutual fund or a hedge fund. (*See* column 1, lines 13-17.) Shkedy teaches a cryptographic key database that contains algorithms and keys for encrypting, decrypting and/or authenticating

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messages. (*See* column 17, lines 41-43.) The keys, however, are not problems and corresponding precalculated solutions as recited in independent Claims 1, 8 and 15. Instead, the cryptographic keys enhance the ability to authenticate a sender of a message and verify the integrity of the message itself, proving that it has not been altered during transmission. (*See* column 17, lines 6-16.) Thus, the keys are tools for encrypting and decrypting instead of problems and corresponding precalculated solutions. Shkedy, therefore, does not cure the deficiencies of Kreulen.

Since the cited combination of Kreulen and Shkedy do not teach or suggest, individually or in combination, a database of problems and corresponding precalculated solutions, the combination of Kreulen and Shkedy do not provide a *prima facie* case of obviousness of independent Claims 1, 8 and 15 and Claims dependent thereon. Accordingly, the cited combination of Kreulen and Shkedy does not teach or suggest each and every element of dependent Claims 2-3, 7, 9-10, 14, 16-17 and 21. Thus, Claims 2-3, 7, 9-10, 14, 16-17 and 21 are not obvious in view of the cited combination and the Applicants respectfully request the Examiner withdraw the 35 U.S.C. §103(a) rejection and allow issuance thereof.

III.   Conclusion

In view of the foregoing remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-21.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

HITT GAINES, P.C.

J. Joel Justiss
Registration No. 48,981

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P.O. Box 832570
Richardson, Texas 75083
(972) 480-8800